

1 *[COUNSEL INFORMATION LISTED*
2 *ON SIGNATURE PAGES]*

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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
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10 _____
11 KIMBERLY NEGRON, on behalf of herself and)
12 all others similarly situated,)

13 Plaintiff,)

14 v.)

15 GOOGLE LLC,)

16 Defendant.)
17 _____)
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Case No.: 4:21-cv-00801-HSG

JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
COMPLAINT RESPONSE
DEADLINES

Pursuant to Civil Local Rule 6-1(a), Plaintiff Kimberly Negron and Defendant Google LLC stipulate as follows:

WHEREAS, pursuant to the Waiver of the Service of Summons dated February 5, 2021, Defendant's deadline to answer or otherwise respond to the complaint filed in Case No. 4:21-cv-00801-HSG (the Negron Complaint") is April 6, 2021 (ECF No. 17);

WHEREAS, on February 9, 2021, Plaintiff filed an Unopposed Administrative Motion to Consider Whether *Negron v. Google LLC* Should Be Related to Certain Google Litigation Pending Before Judge Freeman *In re Google Digital Advertising Antitrust Litigation*, Case No. 5:20-cv-03556-BLF (ECF No. 88);

WHEREAS, on February 16, 2021, defendants filed a Statement in Support of Plaintiff's Unopposed Administrative Motion to Consider Whether Cases Should be Related. (*In re Google Digital Advertising Antitrust Litigation*, Case No. 5:20-cv-03556-BLF (ECF No. 94));

WHEREAS, on March 2, 2021, Judge Freeman issued a Related Case Order denying Plaintiff's administrative motion (*In re Google Digital Advertising Antitrust Litigation*, Case No. 5:20-cv-03556-BLF (ECF No. 108) ("Google Digital" Action));

WHEREAS, although ruled unrelated, the allegations and the time periods of the cases overlap considerably, and the parties have discussed the time and cost saving advantages of seeking to align certain pre-trial procedures in the "Publishers" Antitrust litigation (Case No. 5:20-cv-08984-BLF) ("Publishers" Action) and the Google Digital Action with the Negron Action before this Court;

WHEREAS, these discussions will take a few more weeks to determine if they can result in a proposal to be placed before this Court and before Judge Freeman;

WHEREAS, the amended complaint in the Publishers Action is currently due to be filed on April 5, 2021 with the defendants' response to that complaint due 60 days thereafter;

WHEREAS, the parties agree this stipulation will not alter the dates set in the Order Setting Initial Case Management Conference and ADR Deadlines in Case No. 4:21-cv-00801-HSG (ECF No. 4) or Order Reassigning Case in Case No. 4:21-cv-00801-HSG (ECF No. 12);

1 WHEREAS, the date of the initial case management conference remains May 6, 2021 at
2 10 AM PT;

3 WHEREAS, the parties will confer on the dates for initial disclosures, early settlement,
4 ADR process selection, discovery plan, and the Rule 26(f) report and objections, and these dates
5 will be addressed at the aforementioned case management conference; and

6 NOW THEREFORE, pursuant to Civil Local Rule 6-1(a), the parties through their
7 respective counsel hereby stipulate as follows:

8 Defendant's deadline to answer or otherwise respond to the complaint filed in Case No.
9 4:21-cv-00801-HSG is extended to June 4, 2021;

10 Plaintiff's deadline to respond to any motion to dismiss is August 3, 2021; and

11 Defendant's deadline to reply to any response is September 3, 2021.
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1 **IT IS SO STIPULATED.**

2 Dated: March 19, 2021

Respectfully submitted,

3 **ISQUITH LAW**

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Counsel for Defendant Google LLC

FILER'S ATESTATION

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Justina K. Sessions attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: March 19, 2021

By: /s/ Justina K. Sessions
Justina K. Sessions, SBN 270914

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2 NORTHERN DISTRICT OF CALIFORNIA
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Case No.: 4:21-cv-00801-HSG

**[PROPOSED] ORDER REGARDING
COMPLAINT RESPONSE
DEADLINES**

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13 The parties having stipulated that Defendant's time to respond to the Complaint in this
14 case should be extended to June 14, 2021, and good cause appearing therefor, it is hereby
15 ORDERED that the time for Defendant to respond to the Complaint is extended to June 4, 2021,
16 Plaintiff's time to respond to any motion to dismiss is August 3, 2021, and any reply brief will be
17 due September 3, 2021.

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20 Dated: March __, 2021

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22 HONORABLE HAYWOOD S. GILLIAM, JR.
23 UNITED STATES DISTRICT JUDGE
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